

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

_____)	
MAKSIM TSVETOVAT, et al.,)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION NO. 1:12CV510 TSE
)	
SEGAN, MASON & MASON, P.C.,)	
)	
Defendant.)	
_____)	

MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT AGREEMENT

Plaintiffs Maksim Tsvetovat, Tatyana Tsvetovat and Christopher Pritchard (hereinafter referred to as “Plaintiffs” or “Class Representatives”), and Defendant Segan, Mason & Mason, P.C. (“Segan Mason”) (collectively the “Parties”), pursuant to Fed. R. Civ. P. 23, hereby move the Court for Preliminary Approval of Class Action Settlement Agreement. For the reasons supplied in the accompanying Memorandum in Support, filed herewith, the parties respectfully request that the court enter a Preliminary Approval Order:

- (1) preliminarily approving a proposed class settlement,
- (2) scheduling a fairness hearing,
- (3) certifying the proposed settlement class for purposes of the proposed class settlement,
- (4) appointing class counsel, and
- (5) approving the form and manner of notice proposed to be sent to all members of the settlement classes.

The parties have attached as exhibits to the Memorandum in Support of this motion a Stipulation of Settlement and the proposed Preliminary Approval Order, which are being

circulated for original signatures that will be filed with the court prior to the hearing on this motion.

Respectfully Submitted,

MAKSIM TSVETOVAT,
TATYANA TSVETOVAT and
CHRISTOPHER PRITCHARD

SEGAN, MASON & MASON, P.C.

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